

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

JOSUE DAVID CUADRA-SEGOVIA

Case No.

7:25mj21

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 22, 2025 in the county of Spartanburg in the  
District of South Carolina, the defendant(s) violated:

Code Section

Offense Description

Title 8 U.S.C. 1326(a)

Illegal re-entry to the United States by alien who was previously removed  
from the United States.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.  
Complainant's signature

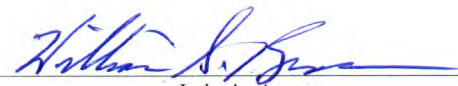
JARED J. TILLEY, Enforcement and Removal, ICE

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/21/2025

  
Judge's signature

City and state:

Greenville, South Carolina

William S. Brown, U.S. Magistrate Judge

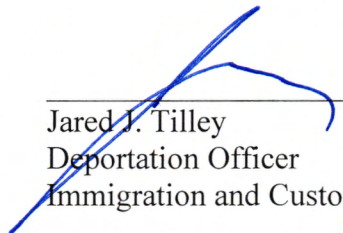
Printed name and title

**AFFIDAVIT**

I, Deportation Officer (DO) Jared J. Tilley, being duly sworn hereby depose and state:

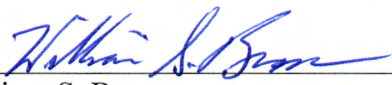
1. I am currently employed as a Deportation Officer with United States Immigration and Customs Enforcement (ICE) and have been so since February of 2009. I earned a bachelor's degree in Sociology in 2005. Previously, I have been employed by ICE as an Immigration Enforcement Agent, and the United States Customs and Border Protection as a Border Patrol Agent starting in January of 2007. As part of my official duties, I investigate criminal and administrative violations of the Immigration and Nationality Act, as well as the United States Code.
2. On or about March 22, 2025, JOSUE DAVID CUADRA-SEGOVIA, was arrested and booked into the Spartanburg County Detention Center on local charges. CUADRA came into ICE custody on April 21, 2025, after being released from his local charges. During administrative processing it was revealed that CUADRA had previously been deported.
3. A check of CUADRA'S immigration file revealed he was deported from the United States in January 2020. A search of the IAFIS database of both fingerprints and photo of CUADRA revealed a deportation on or about that same date.
4. There is no record that CUADRA ever obtained permission from the Attorney General of the United States or his successor, the Director of Homeland Security, to reapply to the INS or ICE for admission into the United States after having been arrested and deported.
5. Having been found in the United States on or about March 22, 2025, after being previously deported from the United States and then reentering without permission from the Attorney General of the United States or his successor, the Director of Homeland Security, there is probable cause to believe that CUADRA is in the United States in violation of Title 8 of the United States Code, Section 1326(a).

Further your affiant sayeth not.



Jared J. Tilley  
Deportation Officer  
Immigration and Customs Enforcement

Sworn before me this 21<sup>st</sup> day of April 2025.



William S. Brown  
United States Magistrate Judge

Greenville, South Carolina